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UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

**RECEIVED**

JUL 16 2019 *ku*

THOMAS G. BRUTON  
CLERK, U.S. DISTRICT COURT

Melissa Banyz

(Enter above the full name  
of the plaintiff or plaintiffs in  
this action)

**1:19-cv-04787**

**Judge Charles R. Norgle, Sr.**

**Magistrate Judge Mary M. Rowland  
PC1**

vs.

C.P.D. 11<sup>th</sup> District  
Officer LaChance (#19619)  
Officer Chum (#17512)

(Enter above the full name of ALL  
defendants in this action. Do not  
use "et al.")

**CHECK ONE ONLY:**

☒

COMPLAINT UNDER THE CIVIL RIGHTS ACT, TITLE 42 SECTION 1983  
U.S. Code (state, county, or municipal defendants)

☐

COMPLAINT UNDER THE CONSTITUTION ("BIVENS" ACTION), TITLE  
28 SECTION 1331 U.S. Code (federal defendants)

☐

OTHER (cite statute, if known)

**BEFORE FILLING OUT THIS COMPLAINT, PLEASE REFER TO "INSTRUCTIONS FOR  
FILING." FOLLOW THESE INSTRUCTIONS CAREFULLY.**

**I. Plaintiff(s):**

- A. Name: Melissa Banyo
- B. List all aliases: Kristin Rabosovich
- C. Prisoner identification number: #R75065
- D. Place of present confinement: Logan C.C.
- E. Address: P.O. BOX 1008; Lincoln, IL 62656

(If there is more than one plaintiff, then each plaintiff must list his or her name, aliases, I.D. number, place of confinement, and current address according to the above format on a separate sheet of paper.)

**II. Defendant(s):**

(In A below, place the full name of the first defendant in the first blank, his or her official position in the second blank, and his or her place of employment in the third blank. Space for two additional defendants is provided in B and C.)

- A. Defendant: Chicago Police Department 11<sup>th</sup> Dist.  
Title: N/A  
Place of Employment: Chicago Police Department
- B. Defendant: LACHANCE, MJ (#19619)  
Title: Officer  
Place of Employment: Chicago Police Department
- C. Defendant: Chum, V (#17512)  
Title: Officer  
Place of Employment: Chicago Police Department

(If you have more than three defendants, then all additional defendants must be listed according to the above format on a separate sheet of paper.)

III. List ALL lawsuits you (and your co-plaintiffs, if any) have filed in any state or federal court in the United States:

- A. Name of case and docket number: 17 CV 4535
- B. Approximate date of filing lawsuit: June 2017
- C. List all plaintiffs (if you had co-plaintiffs), including any aliases: Melissa Barys
- D. List all defendants: Sheriff Tom Dart, CCDOC
- E. Court in which the lawsuit was filed (if federal court, name the district; if state court, name the county): Northern District of Illinois, Eastern Division
- F. Name of judge to whom case was assigned: Judge ~~XXXX~~ Gary Fennerman
- G. Basic claim made: Living in unsafe / hazardous conditions.
- H. Disposition of this case (for example: Was the case dismissed? Was it appealed? Is it still pending?): UNKNOWN
- I. Approximate date of disposition: FEB. 2018?

IF YOU HAVE FILED MORE THAN ONE LAWSUIT, THEN YOU MUST DESCRIBE THE ADDITIONAL LAWSUITS ON ANOTHER PIECE OF PAPER, USING THIS SAME FORMAT. REGARDLESS OF HOW MANY CASES YOU HAVE PREVIOUSLY FILED, YOU WILL NOT BE EXCUSED FROM FILLING OUT THIS SECTION COMPLETELY, AND FAILURE TO DO SO MAY RESULT IN DISMISSAL OF YOUR CASE. CO-PLAINTIFFS MUST ALSO LIST ALL CASES THEY HAVE FILED.

I have filed a lawsuit against CCDOC + officer Koustospongias, but didn't pursue it. Cruel & unusual punishment.

The Northern Dist. of Illinois, Eastern Division around 2015.



## IV. Statement of Claim:

State here as briefly as possible the facts of your case. Describe how each defendant is involved, including names, dates, and places. **Do not give any legal arguments or cite any cases or statutes.** If you intend to allege a number of related claims, number and set forth each claim in a separate paragraph. (Use as much space as you need. Attach extra sheets if necessary.)

On July 13, 2017 at approximately 6 a.m. I was on Kostner & Lexington (S.W. side of the street where there's a vacant lot.). Allan Robinzine beat me & choked me inside of a vehicle for at least 20 minutes. I was choked until I ~~piss~~ urinated on myself. He brutally beat me while on top of me. His girlfriend came to the rear window attempting to record everything on her cellular phone. She kept yelling for me not to touch her man. I was finally able to get loose from Robinzine's grip & make it outside of his vehicle. While I was on the ground Robinzine broke my left arm by stomping it with his right foot. His girlfriend then sat on top of me until C.P.D. arrived on the scene. This vehicle appeared to be abandoned because it was left unlocked on a known to be vacant lot on the southwest corner of Kostner & Lexington; Chicago, IL. 60624.



when 1<sup>st</sup> District C.P.D. arrived on the scene I informed the police that I needed emergency medical attention, which I was denied. I was transported to Harrison & Kenzie Police Dept. By Officer LaChance # . My rights were deprived as guaranteed by the U.S. Constitution of federal law. Cruel and unusual punishment was used against me in this case B/C I suffered in excruciating pain w/ my left arm Broken. I wasn't actually seen properly by a medical doctor until the following day B/C Officer LaChance told me I was being released on a misdemeanor criminal trespassing, so I was taken back to the station where I was held B/C this charge was upgraded. At the scene Officer LaChance picked up a tool which was found underneath the vehicle. At no point in time did I possess this tool or use forceful Entry on any vehicles on that vacant lot. There was no Ballistics test ran & if there was my fingerprints wouldn't have been on that tool. I have a prior criminal background, which both LaChance and Chum, (C.P.D. officers) were both aware of. Due to the many times I was stopped in the neighborhood <sup>Revised 9/2007</sup> By ~~143~~ them to do a CLEAR search on my name.



Pg. 3

I did not get seen by a medical doctor until the following day @ St. Anthony's Hospital. When officers, Sergeant, & Lieutenants arrived on the scene, my character was defamed, I was degraded & falsely accused of a crime I did not commit. Mr. Allan Robinson was not held accountable for his actions which nearly cost me my life. I was not allowed to countersuit charges when I requested to do so at the 11th District - Harrison & Kedzie C.P.D., yet the police are sworn in to serve and protect our Community. Justice was not served in this case. My life is irreplaceable and taken for granted. I had to get surgery & risked my life again B/c I had a plate going along my left forearm by my main artery already. B/c of this incident I nearly lost my life multiple times. Evidence is on body worn cameras, through medical reports, and a few eyewitnesses. My arm was almost lost and once again my life is irreplaceable.

C.P.D. is sworn in to serve justice and to serve and protect. In this instance I was treated w/ cruel and unusual punishment by withholding medical tx, not allowing me to exercise my Constitutional rights, and defaming my character as a human being.

V. Relief:

State briefly exactly what you want the court to do for you. Make no legal arguments. Cite no cases or statutes.

Compensation

VI. The plaintiff demands that the case be tried by a jury. ☒ YES ☐ NO

CERTIFICATION

By signing this Complaint, I certify that the facts stated in this Complaint are true to the best of my knowledge, information and belief. I understand that if this certification is not correct, I may be subject to sanctions by the Court.

Signed this 19<sup>th</sup> day of June, 2019

Melissa A. Bangs

(Signature of plaintiff or plaintiffs)

Melissa Bangs

(Print name)

R75065

(I.D. Number)

LOGAN C.C.

P.O. BOX 1000

LINCOLN, IL 62656

(Address)



IN THE

United States District Court  
Northern District of Illinois  
Eastern Division

Melissa Bangs  
Plaintiff/Petitioner

Vs.

C.P.D. 11th District

No. \_\_\_\_\_

Churn, V (Officer #

LAChance, M J (Officer #19619)

NOTICE OF FILING / PROOF OF SERVICE

TO: U.S. District Court  
Northern District of Illinois,  
Eastern Division  
219 S. Dearborn, 20th FL.  
Chicago, IL 60604

TO: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

PLEASE TAKE NOTICE that on 06 / 19 / 2019, I placed the attached or enclosed documents in the institutional mail at Logan Correctional Center properly addressed to the parties listed above for mailing through the United States Postal Service.

DATED: 06 / 19 / 2019



/s/ Melissa A. Bangs  
Name: Melissa S. Bangs  
IDOC #: R75065

Logan Correctional Center  
1096 1350th Street  
PO Box 1000  
Lincoln, Illinois 62656

Subscribed and Sworn to Before me this

19th day of June, 2019

Deanna A Bigger  
Notary Public

MEISSA BARRY #RT5005  
P.O. BOX 1000  
LINCOLN, IL 62656



U.S. POSTAGE PITNEY BOWES



ZIP 62656 \$ 001.45<sup>0</sup>  
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2019 JUL 16 AM 8:25

1:19-cv-04787

Judge Charles R. Norgle, Sr.

Magistrate Judge Mary M. Rowland

PC1

Attn: Clerk of  
U.S. District Court  
Northern District of Illinois,  
Eastern Division  
219 South Dearborn, 20<sup>th</sup> Fl.  
Chicago, IL 60604



07/16/2019-6

A Legal MAIL★



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mail  
✓